

Megan Douglass

From: Benjamin King [benjamin@nhlawoffice.com]
Sent: Wednesday, January 24, 2018 1:42 PM
To: 'Megan Douglass'
Subject: FW: Leite v. Corrections Officers Goulet et al., USDC-DNH, No. 15-cv-280

Very truly yours,
Benjamin T. King, Esq.
Douglas, Leonard & Garvey, P.C.
14 South Street, Suite 5
Concord, NH 03301
(603) 224-1988
fax (603) 229-1988
www.nhlawoffice.com

From: Sansone, Kenneth A [mailto:Kenneth.Sansone@doj.nh.gov]
Sent: Friday, August 28, 2015 12:14 PM
To: Benjamin King
Subject: RE: Leite v. Corrections Officers Goulet et al., USDC-DNH, No. 15-cv-280

Ben—I wrote two of the former employees in early August, and haven't heard back. Their last addresses on file with DOC are:

Esobe, Ejike 2 First Street, Gorham, NH 03581
Marquis, Heather 183 Willow Street, Berlin, NH 03570

I did not end up trying to contact the third former employee, Mr. Van Hoesen, at his home address until last week (my office was under the mistaken impression that was still working for DOC and had been trying to reach him through the department) so I would propose that we give him some additional time to respond before you go through the trouble of sending the sheriff to his house. If you don't want to wait any longer, though, just let me know and I'll send his address along.

I am happy to accept service electronically on behalf of those defendants who have authorized me to accept service, and to file something to that effect with the court if necessary. I may end up needing to ask for some additional time to file a response to the first amended complaint on behalf of those parties, though, because I have several filings due in other cases throughout September.

Look forwarding to hearing back from you.—Ken

From: Benjamin King [mailto:benjamin@nhlawoffice.com]
Sent: Friday, August 28, 2015 11:59 AM
To: Sansone, Kenneth A
Subject: RE: Leite v. Corrections Officers Goulet et al., USDC-DNH, No. 15-cv-280

Hi, Ken. Could you provide me the last known addresses for the three (3) former employees? I would then try to serve them using the Sheriff, and I would serve the other defendants by electronically serving you, if that would be acceptable to you. Please let me know.

Very truly yours,
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From: Sansone, Kenneth A [<mailto:Kenneth.Sansone@doj.nh.gov>]
Sent: Friday, August 28, 2015 11:53 AM
To: Benjamin King
Subject: RE: Leite v. Corrections Officers Goulet et al., USDC-DNH, No. 15-cv-280

Ben—At present, I've received authorization to accept service on behalf of all the defendants named in the first amended complaint, with three exceptions: Elmer Van Hoesen, Heather Marquis, and Ejike Esobe. None of these three works for DOC anymore, so I've attempted to contact each of them at the address that's on file, but have not heard back from any of them yet. In light of this, let me know how you propose to proceed.—Ken

From: Benjamin King [<mailto:benjamin@nhlawoffice.com>]
Sent: Friday, August 28, 2015 11:24 AM
To: Sansone, Kenneth A
Subject: RE: Leite v. Corrections Officers Goulet et al., USDC-DNH, No. 15-cv-280

Dear Ken:

The Court has allowed the attached First Amended Complaint. Have you been able to obtain authorization to accept service for the defendant correctional officers?

Thanks. I look forward to hearing from you.

Very truly yours,
Benjamin T. King, Esq.
Douglas, Leonard & Garvey, P.C.
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From: Sansone, Kenneth A [<mailto:Kenneth.Sansone@doj.nh.gov>]
Sent: Monday, July 27, 2015 9:12 AM
To: Benjamin King
Subject: Leite v. Corrections Officers Goulet et al., USDC-DNH, No. 15-cv-280

Ben—Further to our conversation last week, I just wanted to provide you with the first and last names of the corrections officers, or former corrections officers, which my office will contact in an attempt to obtain their agreement to accept service in this matter. They are:

Matthew Goulet
Elmer Van Hoesen
Michael Beaton
Lynn McLain
Heather Marquis

Trevor Dube
Rhianne Snyder
Eddy L'Heureux
Jeffrey Smith
Dwane Sweatt
Yair Balderrama
Bob Morin
Ejike Esobe
Kathy Bergeron

As we discussed, our office will attempt to contact each of these individuals and attempt to procure their agreement that this office accept service on their behalf—this process may take some time, and there's no guarantee that everyone will agree to allow us to accept service on his or her behalf. In the meantime, you will file an amended complaint dropping the rest of the defendants you originally named. As I mentioned, through this agreement, we are not conceding that any defendant has been properly named or otherwise waiving any other available defense.

Let me know if you have any questions. Otherwise, I'll be in touch.—Ken